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February 15, 2023

**VIA ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Feliz v. iHealth Labs Inc.*, Case No. 1:23-cv-00354 (JLR)

Dear Judge Rochon:

We represent plaintiff Roberta Feliz (“Plaintiff”) in the above-referenced action. Pursuant to Rule 1.F of Your Honor’s Individual Rules of Practice in Civil Cases, Defendant the iHealth Labs Inc. (“Defendant”) has requested an extension of time—from February 15, 2022, until April 14, 2023—to respond to Plaintiff’s complaint. Plaintiff consents to the extension request. Plaintiff is submitting this letter motion as a courtesy to Defendant, whose counsel has not yet appeared in this action. In fact, Defendant requests this nearly sixty-day extension in order to provide time for their out-of-state counsel, Steven Soloway of DeHeng Law Offices PC, to become admitted in the Southern District of New York. Defendant has not previously sought an adjournment of this deadline.

Furthermore, the parties are engaged in, and will continue to engage in, informal settlement discussions until Defendant’s counsel becomes admitted and can appear in this action. However, given the circumstances, the parties also request an extension of time to file the joint letter that this Court ordered on January 18, 2023. *See* Docket No. 5. The joint letter is currently due on March 13, 2023, and the parties request an extension of this deadline until April 14, 2023, as well. Neither party has previously sought an adjournment of this deadline.

We thank the Court for its consideration of the above request.

Respectfully submitted,  
/s/ William Downes  
William Downes

cc: All Counsel of Record

SQ ORDERED

A handwritten signature of Jennifer L. Rochon in black ink.  
JENNIFER L. ROCHON  
United States District Judge

The request is GRANTED. Defendant shall answer or otherwise respond to the complaint by **April 14, 2023**. The parties shall submit a joint status report by **April 14, 2023**. Plaintiff is directed to serve a copy of this order on Defendant.

Dated: February 16, 2023  
New York, New York